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Attorney for Cyrus Sullivan

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CYRUS SULLIVAN.  
  
Defendant.

3:13-CR-00064-HZ  
3:14-CR-00190-HZ

UNOPPOSED MOTION TO  
CONTINUE SUPERVISED  
RELEASE REVOCATION  
HEARINGS

I, Tiffany A. Harris, declare the following to be true to the best of my knowledge:

1. On March 1, 2017, pursuant to 18 U.S.C. § 3006A(e)(2)(the Criminal Justice Act), I was appointed to represent Mr. Sullivan in two cases that had been consolidated for hearings on alleged violations of Mr. Sullivan's supervised release.

2. The contested issues to be decided at the revocation hearing are complex. They involve disputed facts and implicate constitutional arguments relating to political speech and the First Amendment.

3. Recently, the parties litigated the terms of a proposed protective order. Following that litigation, the Government made discovery available to the defense today.

4. I am requesting a short continuance in order to complete my preparations and

review the discovery with my client, who is detained at the Multnomah County Detention Center.

5. I have conferred with the Government and Probation Department. Neither objects to a continuance, and all parties request a setting on June 7<sup>th</sup> or June 8<sup>th</sup> of 2017, subject to the Court's availability.

I declare under penalty of perjury that the forgoing is correct to the best of my knowledge and belief.

DATED this 4th day of May, 2017.

Respectfully submitted,

/S/ Tiffany Harris  
Tiffany A. Harris  
Attorney for Defendant Cyrus Sullivan